

# MONTHLY ENVIRONMENTAL COMPLIANCE REPORT

FOR THE REPORTING PERIOD  
FEBRUARY 16, 1993 THROUGH MARCH 15, 1993

REPORT DATE: APRIL 5, 1993

EG&G ROCKY FLATS, INC.  
STANDARDS, AUDITS AND ASSURANCE DEPARTMENT  
ENVIRONMENTAL COMPLIANCE SUPPORT

DOCUMENT CLASSIFICATION  
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# MONTHLY ENVIRONMENTAL COMPLIANCE REPORT

## 1. INTRODUCTION

The Monthly Environmental Compliance Report is a deliverable under the EG&G Rocky Flats, Inc., (EG&G) Environmental Compliance Program (ECP) and is prepared by the Standards, Audits, and Assurance (SAA) Environmental Compliance Support (ECS) Branch. This Report covers the period from February 16, 1993 to March 15, 1993. Improvements in format and content continue based on suggestions from reviewers and electronic reporting media updates.

The data in this Report is primarily based on data contained within the Plant Action Tracking System (PATS). The Report is reviewed for accuracy and completeness by appropriate program managers. The following discussion presents a summary and status of the various environmental compliance items researched for the period covering February 16, 1993 through March 15, 1993.

## 2. TEN-POINT ACTION PLAN RESPONSE

**2.1 Summary:** DOE's Ten-Point Action Plan was translated into 18 EG&G action plans to be implemented by various EG&G organizations. Those action plans were submitted to DOE, RFO for comment. DOE, RFO comments resulted in the establishment of the Joint Environmental Compliance Oversight Committee (JECOC) which established working relationships among action plan specific subject matter experts and DOE, RFO counterparts.

The JECOC has been temporarily disbanded having fulfilled its immediate function and Commitments Coordinators have been tasked with finalizing the action plan revisions and/or agreements. As a result of committee efforts, two action plans were to be revised. Action Plan Numbers 4, 11, and 16 are revised in final form. Action Plans 11 and 16 were combined into one plan, 11a & 16a, which deals exclusively with PATS upgrades. There are 19 new tasks resulting from this revision.

There are only 28 tasks remaining open, including the 19 new tasks from 11a and 16a, 7 of which are due to close during the next reporting period. Resource Conservation and Recovery Act (RCRA) training comprises most of the remaining tasks, outside of those related to PATS upgrades, and that seems to be running behind schedule as many of those tasks are reported as delinquent.

## 3. JUNE 1992 COLORADO DEPARTMENT OF HEALTH NOTICE OF VIOLATION

**3.1 Summary:** EG&G received a Notice of Violation (NOV) with 56 alleged violations from the Colorado Department of Health (CDH) in June of 1992. There were two other NOV's dated March 28, 1990, and May 22, 1990 respectively. EG&G disputes the legal and factual basis of

many of the allegations. However, for the purpose of this status report, all factual allegations are assumed to be correct as written. One hundred forty-eight tasks have been identified that address issues raised in the Notice of Violation. The NOV tasks are tracked separately by Environmental and Waste Management (E&WM).

All but 7 tasks have been closed, 6 of which deal with RCRA training to be completed by June 15, 1993. The remaining task is an ongoing effort to implement a contingency plan for emergency transfers to Building 374. Completed this period was the Groundwater Assessment Plan (GWAP) which was submitted and accepted as complete by DOE, RFO in their March 22, 1993 letter to EG&G. See Table 3 for task level details.

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#### **4. ENVIRONMENTAL SELF-ASSESSMENT (PILOT BUILDINGS 460 AND 559)**

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**4.1 Summary:** PATS is currently reflecting data on the Buildings 460 and 559 Environmental Compliance Pilot Project Programs (ECPP). Items discovered for disposition are entered into PATS through its expedited data entry (EDE) system. Items entered into EDE are reviewed by the ECPP team which is made up of ECPP members, DOE, RFO, and CDH. The team examines the data in EDE and determines whether the item meets a level of significance requiring the item to be entered into formal PATS. See Table 4 for details of items being tracked in formal PATS.

Four new tasks were reported during the reporting period for Building 559; no new tasks were reported for Building 460. CDH conducted no inspections for either building during the reporting period. CDH has tentatively scheduled a surveillance for Building 460 for April 21, 1993.

**4.2 OTHER BUILDING REPORTS:** This section of the Report is a discussion about building-specific issues. This part of the report provides an avenue in which Building Operations Managers may include environmental compliance information relative to their respective buildings. Building-specific information is taken from reports submitted to ECS.

**ENVIRONMENTAL COMPLIANCE STATUS IN BUILDINGS AND OPERATIONS AREAS:** A containment house of the 210 trough in Building 374 was completed. In the 800 Area, temporary RCRA lines were installed in Building 881; the tanks in Building 886 were cleaned, and repairs were made to the floor of Building 884. A new submersible pump in 207B center pond was also installed during this reporting period.

**TASKS SCHEDULED FOR COMPLETION DURING THE NEXT REPORTING PERIOD:** Work is continuing to improve the sludge drying capability of the waste water treatment plant. The new scheduled completion date is June 30, 1993. Also scheduled for additional work during the next reporting period is secondary containment in Building 887 as well as the anchoring of the flaps on Waste Tent #1.

**SURVEILLANCES PERFORMED DURING THE REPORTING PERIOD AND THE DOCUMENTED RESULTS:** A CDH audit of shipping files (manifests and waste profile data sheets) was

completed on February 24, 1993. At this time Regulated Waste Operations has received no comments that require a response. DOE, RFO inspected Building 884 and requested that secondary containment calculations be performed and Toxic Substance Control Act (TSCA) training records be produced for their review.

EG&G Waste Surveillance conducted tours of Building 774, the results of which are documented in Building 774, Room 204. Weekly inspections were conducted of RCRA satellite and 90-day storage areas in Building 439/440. Copies of the documented results are available in the weekly inspection log book in T439D.

#### ENVIRONMENTAL COMPLIANCE PROBLEMS IDENTIFIED DURING THIS REPORTING PERIOD:

~~Samples were taken of three drums of silver nitrate fixer stored in Building 122. Those~~ samples were submitted to the 881 lab for analyses. The analyses were received by Building 122; thus, these chemicals could now be shipped to Building 774 for inclusion in the Plant recycling program. However, these drums cannot be shipped until the Building 774 labs are reopened so that the 774 lab can accept the drums.

The Property Release Evaluation Request forms were completed on March 10, 1993, and the excess chemical forms were submitted on March 19, 1993 on the flammable storage cabinet north of T452B. The chemicals were placed into three categories: (1) RCRA, (2) Non-RCRA, and (3) Unknown. The RCRA chemicals are scheduled for disposition on March 22, 1993 to meet the expiration date of the 90-day accumulation area. The disposition of the non-RCRA and unknown chemicals is also in progress. A meeting is scheduled for March 24, 1993 for all responsible parties.

The repairs to the sump of Building 732 laundry waste pit were completed and tested on March 9, 1993 by J. A. Jones. Other repairs performed by EG&G Maintenance failed the leak test; therefore, another action plan is to be submitted to perform another Engineering evaluation, and to complete the repairs and the leak test. The action plan is due to Facilities Planning Management by March 26, 1993.

OTHER ENVIRONMENTAL COMPLIANCE INFORMATION: The drum that was found by Building 251 and the three overpack drums found outside of Building 552, of which there was no process knowledge regarding their contents, were sampled on February 19, 1993 by Regulatory Waste Operations. The results are being evaluated by the Waste Stream/Residue Identification and Characterization (WSRIC) manager to determine disposition of the drums. The evaluation will be forwarded to Waste Technical Support (WTS) the week of March 15, 1993. WTS will issue Documentation of Guidance for disposition of these drums.

One offsite shipment of 27 drums of non-regulated waste was completed on March 3, 1993.

## 5. REGULATORY COMMITMENTS

5.1 Summary: This category includes the following:

- National Pollutant Discharge Elimination System (NPDES) Permit No. 0001333
- Clean Water Act Federal Facilities Compliance Agreement (FFCA-CWA-90-1), March 25, 1991
- Land Disposal Restrictions (LDRs) Federal Facilities Compliance Agreement II, May 10, 1991
- Comprehensive Treatment and Management Plan for LDRs, June 9, 1992
- Interagency Agreement, January 22, 1991
- Administrative Compliance Order for Radionuclide NESHAPs, March 13, 1992
- Residue Compliance Order, July 1991
- Agreement in Principal, June 28, 1989
- RCRA Part A and Part B Permits No. CO 7890010526

Many of the above-listed commitments have been entered into PATS for tracking and they are summarized on Table 5 of this report. There are currently 246 tasks open and 5 delinquent in all of the environmental commitments currently tracked.

## 6. COLORADO DEPARTMENT OF HEALTH INSPECTIONS

6.1 Summary: The Colorado Department of Health conducted several inspections and meetings relating to those inspections during this reporting period. The following is a summary of those activities.

COLORADO DEPARTMENT OF HEALTH EXIT BRIEFING FOR BUILDING 774 SILVER RECOVERY AND ENVIRONMENTAL RESTORATION: On February 12 and February 17, 1993, representatives of the Colorado Department of Health (CDH) attended meetings in which issues related to inspections of Building 774 silver recovery processes, Property Utilization and Disposal (PU&D), and the Environmental Restoration areas were discussed.

February 12, 1993 (Meeting regarding February 10, 1993 inspection)

On February 10, 1993, CDH representatives from the Inspection and Monitoring Division inspected the silver recovery process in Building 774.

Following a briefing on Building 774, the DOE representatives initiated discussions on the PU&D yard and the 980/964 laydown yards.

There was much discussion regarding the mixing of like wastes for sampling and characterization. (The CDH inspector stated that in order to mix similar wastes for the purpose of consolidated sampling, two criteria must be met. First, there must be labeling or other "process knowledge indicators" on the containers. The CDH inspector stated that there must be reasonable cause to believe that the contents of the containers is similar. Second, there must be

similar fingerprint analysis for the contents of the containers. If either of these criteria are not met, the container must be treated as an unknown and characterized separately.)

The discussion then turned to the meeting and tour of the Environmental Restoration (ER) areas which had taken place earlier that day. Representatives of both CDH and DOE stated that there were noncompliances in the following areas:

- Improper characterization of the environmental media and waste generated from drilling operations and the two Operable Units currently generating wastes.
- Failure to remove accumulated precipitation from secondary containment within 24 hours. ~~(At the Remedial Action Decontamination Pad)~~
- Inadequate training of the personnel assigned to the area. (The CDH and DOE representatives stated that an individual had made comments to the inspectors which indicate a lack of proper training.)
- No leak detection as a result of the liquid and ice in the secondary containment and inadequate training of the personnel assigned to the area.

#### February 17, 1993

On February 17, 1993, a meeting was held by Waste Surveillance and the EG&G Classification Office to provide CDH inspectors information regarding the classification release requirements for documents and photographs.

#### COLORADO DEPARTMENT OF HEALTH (CDH) INSPECTION OF TRAFFIC AND REGULATED WASTE SHIPPING RECORDS:

#### February 24, 1993

On February 24, 1993, CDH enforcement inspectors reviewed records maintained by the EG&G Traffic and Regulated Waste Departments concerning offsite shipments of hazardous wastes, mixed wastes and waste oils.

The following issues/comments were noted during the closeout meeting:

- Manifest #03236 does not list Environmental Protection Agency (EPA) codes for a shipment of waste diisopropyl ether, made on April 4, 1991. K. Lenarcic, Traffic, explained that because the ether had crystalized, this shipment was made on an emergency basis.
- Analysis contained in Chemical Waste Management, Inc.'s Waste Profile #H75544 dated January 29, 1993, listed mercury levels of 77 ppm for fluorescent light bulbs. This information contradicts data utilized in characterizing this waste stream as non-



hazardous. This information was forwarded to A. L. Church, Waste Identification and Characterization.

- Waste characterization is verified by Regulated Waste utilizing the (WSRIC) books. The enforcement inspectors noted that the WSRIC books are reported to "have quite a few problems" and questioned whether they are a good verification tool.
- The enforcement inspectors suggested utilizing the paint filter test to determine free liquid content in containers instead of Real Time Radiography (RTR). They suggested that this approach could eliminate the need to repack containers rejected for small amounts of liquid.

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#### REPORT ON THE COLORADO DEPARTMENT OF HEALTH INSPECTION OF BUILDING 371:

March 4, 1993

On March 4, 1993, enforcement inspectors of the CDH and the EPA inspected Building 371. The purpose of the inspection was to determine what progress has been made towards cleanup of the May 24, 1992, release in Room 1117.

- The enforcement inspectors stated that they were concerned that some areas, like Room 1117, will be highly contaminated until transition Decontamination and Decommissioning (D&D) efforts.
- The inspectors stated that they will review their notes from the June 4, 1992, inspection of this area and make comments at a later date. A Notice of Inspection was issued noting continued leakage (salts and seepage) from tanks that are "empty", decontamination of Room 1117, and the excessive amounts of time required to prepare and perform work packages.

#### COLORADO DEPARTMENT OF HEALTH (CDH) INSPECTION OF BUILDING 881 POLYMERIZATION PROCESS:

March 9, 1993

On March 9, 1993, EPA and CDH enforcement inspectors attended a briefing on the polymer solidification process. The briefing was followed by a demonstration of the process located in Room 296 of Building 881. The CDH inspectors did not consider this to be an inspection; a Notice of Inspection was not issued.

### 7. DOE ENVIRONMENTAL OVERSIGHT

**7.1 Summary:** There are two organizations within DOE, RFO that routinely conduct surveillances/evaluations on environmental oversight. One is the Waste Operations Branch (WOB) and the other is the Performance Assessment and Quality Assurance Office (PAQAO).

RFO, WOB conducts environmental oversight surveillances based upon RCRA, TSCA, Colorado Hazardous Waste Regulations, and Conduct of Operations for waste facilities under DOE Order 5480.19. RFO, PAQAO conducts evaluations on environmental activities, in addition to other activities, emphasizing quality and performance. Evaluations are audits or assessments. Surveillances are more specific examinations of a particular item.

#### RFO, WOB

The number of DOE environmental oversight open tasks total 60. None of the 60 tasks include the significant items from 3 DOE environmental oversight surveillances that were conducted between February 16, 1993 through March 15, 1993. See Table 7 for details.

The following table is a partial extraction of the findings described in Table 7 indicating the more common findings. These findings are being highlighted because RFO, WOB consistently identifies these tasks during its monthly surveillances.

<u>TASK DESCRIPTION</u>	<u>OPEN</u>	<u>COMPLETE</u>	<u>DELINQUENT</u>
WASTE CHARACTERIZATION	8	3	4
PLAN*	7	5	2
TRAINING	4	3	0
STORAGE	1	3	0
MANAGEMENT**	3	2	0
DISPOSAL	3	0	3

- Plan generally refers to an implementation plan, including a comprehensive waste management plan, a closure plan, or a corrective action plan. They set out tasks and timelines.
- • Management items are generally organizing activities.

RFO, WOB conducted 3 environmental oversight surveillances during the reporting period. As of March 29, 1993, EG&G had not received surveillance reports on any of the surveillances. Following is a summary, as reported during interviews with RFO, WOB, of the significant items resulting from the 3 surveillances:

- |                       |   |
|-----------------------|---|
| Fire Protection Plan: | <ul style="list-style-type: none"><li>• plan is obsolete; and</li><li>• plan is not in compliance with all applicable sections of the Colorado Hazardous Waste Regulations</li></ul>  |
| Building 776:         | <ul style="list-style-type: none"><li>• inaccuracy of process numbers for non-routine waste;</li><li>• qualification/certification of waste generators;</li><li>• solid waste treatment personnel need to be more familiar with waste/residue traveler; and</li></ul> |

SARF: (Supercompacting and Repackaging Facility)

- several low-level waste boxes were not labeled as radioactive
- operators in C-cell performing to Category 1 procedures subject to weak communication with foreman or reader;
- magnahelic gauge defect caused spurious low flow alarm despite fact that gauge was reading properly

#### RFO, PAQAO

The number of RFO, PAQAO open tasks total 18. None of the 18 tasks include the significant items from 2 RFO, PAQAO evaluations that were conducted between February 16, 1993 through March 15, 1993. See Table 7a for details.

RFO, PAQAO conducted 2 environmental oversight evaluations during the reporting period. As of March 29, 1993, EG&G had not received reports on either of the evaluations. Following is a summary, as reported during interviews with RFO, PAQAO, of the significant items resulting from the evaluations:

Environmental Radiochemistry:  
by management

- Quality Assurance program has not been approved and is only partially implemented; and
- environmental radiochemistry procedures do not reflect current laboratory practices and are not supported by a document control system

Groundwater Sampling:

- groundwater field parameter measurements are not validated to approve data quality objective criteria

**7.2 Status:** The above surveillance summaries address only the significant items. Once EG&G receives the surveillance reports, all identified items requiring actions will be entered and tracked in PATS.

RFO, WOB has 3 surveillances planned for the next reporting period. The scheduled surveillances will be of Bldg. 774, the SARF and Conduct of Operations in Bldg. 774.

RFO, PAQAO has 2 surveillances planned for the next reporting period.

## **8. RCRA WASTE CONTINGENCY PLANS**

**8.1 Summary:** The items reported in this section reflect the implementations of contingency plans as incidents have occurred through January 15, 1993. There have been 23 implementations to date. No new actions were reported during the current reporting period.

**9. EG&G SELF-ASSESSMENTS:  
BUILDING-SPECIFIC, RCRA and TSCA (PCB) TASKS**

**9.1 Summary:** The RCRA-related open tasks for RFP, as determined by SAA's Assessment group, as of March 15, 1993 number 84. The following table is a partial extraction of findings described in Table 9. These findings are being highlighted because SAA's Assessment group consistently identifies these tasks during its surveillances.

<u>TASK DESCRIPTION</u>	<u>OPEN</u>	<u>COMPLETE</u>	<u>DELINQUENT</u>
RECORDS	25	74	10
SECONDARY CONTAINMENT	19	10	1
INSPECTION	2	10	0
LABELING	6	6	3
TRAINING	2	2	1
WASTE CHARACTERIZATION	5	2	1
STORAGE	3	0	2

The TSCA PCB-related tasks for RFP, as determined by SAA's Assessment group, as of March 15, 1993 number 15. The following table is a partial extraction of findings described in Table 9. These findings are being highlighted because SAA's Assessment group consistently identifies these tasks during its surveillances.

<u>TASK DESCRIPTION</u>	<u>OPEN</u>	<u>COMPLETE</u>	<u>DELINQUENT</u>
MANAGEMENT*	2	0	0
RECORD	3	2	2
TRAINING	5	0	1

\* Management items are generally organizing activities.

Table 9 shows that there are a total of 29 delinquent tasks; i.e., tasks that were not completed as of March 15, 1993. Of these 29 tasks, one had a due date older than 160 days.

According to PATS, Oxnard has no RCRA or TSCA PCB-related tasks open this reporting period.

**10. MISCELLANEOUS**

New information being reported this period includes surveillances conducted by EG&G's Surface Water Division. Approximately 12 surveillances have been conducted to date, with 2 surveillances planned for the next reporting period. Sixteen action plans were entered into PATS this period. Fifteen of the action plans have not been written as of March 15, 1993. There is 1 open task. See Table 10 for details.

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## 10.1 Miscellaneous Commitments:

10.2 Training: Performance Based Training (PBT) offers, or is in the process of developing, various environmental and health and safety courses. The following is a brief description of four courses, three of which are new and one that has been significantly revised pursuant to new regulatory requirements:

Responder Technician Course: In this course the technicians, who are responsible for conducting initial and/or final repairs, are trained to take the offensive approach to hazardous material spills to mitigate the situation caused by a spill. Technicians responsible for such repairs have not been offered formal training by PBT prior to the development of this course. This course is at a level just above the 1st Responder Operations course which targets those individuals responsible for initial notifications and emergency containment, if possible, in a spill situation. Responder Technician courses will be offered beginning May 1993.

Environmental Laws and Regulations Workshop: This workshop will provide a framework for understanding the general principles which guide environmental laws, policies and programs, how those environmental authorities drive the need for new technologies, treatment methods, and planning. The workshop will introduce participants to the environmental law system and several federal environmental statutes and associated regulations. This is a basic introduction and assumes no prior formal knowledge of environmental law. Environmental Laws and Regulations workshops will be offered beginning June 1993.

Line Control Program Safety Training: This course describes a system that promotes excellence in safety and health by placing accountability and responsibility on line management and the worker. This workshop is designed to assist line management in their safety responsibilities by increasing their ability to recognize workplace hazards, evaluating the risk of hazards, and identifying ways to control the identified hazards. Line Control Program Safety Training is new and currently available.

24- and 40-Hour Hazardous Waste Operations Course: These two courses were revised to meet the training requirements of current OSHA 29 CFR 1910.120 regulations, the proposed 29 CFR 1910.121 standards, the DOE Environmental Guidance Document, OSHA Training Requirements for Hazardous Waste Operations, December 1991, and plant-specific worker needs. Numerous interactive exercises and innovative learning techniques were designed into this course to increase the worker's learning and enhance retention. The updated 24- and 40-hour Hazardous Waste Operations Courses are currently available.

PBT offers many other environmentally-related courses, all of which are available to anyone within EG&G by scheduling through Performance Training Records, Building 060. The following table summarizes environmental training that is offered by PBT and the number of EG&G employees that completed such training during this reporting period:

COURSE NAME	COURSE #	DRIVER	#STUDENTS 2/16 - 3/15	#STUDENTS FYTD
40 Hour Haz Wst Ops	018-691-03	29CFR 1910.120	29	170
24 Hour Haz Wst Ops	018-691-02	29CFR 1910.120	25	138
8 Hour Haz Wst Ops Mgmt	018-691-01	29CFR 1910.120	8	25
8 Hour Haz Wst Ops Refr	018-691-05	29CFR 1910.120	212	924
Responder Awareness	062-472-01	29CFR1910.120	2	11
Responder Operations	062-471-01	29CFR1910.120	2	12
Resp Awareness Refr	019-471-01	29CFR1910.120	8	8
Responder Ops Refr	019-472-01	29CFR1910.120	8	8
Incident Command	021-370-01	29CFR1910.120	3	9
Incident Command Refr	019-370-01	29CFR1910.120	8	8
Responder Technician	019-474-01	29CFR1910.120	0	0
SCBA	019-170-01	29CFR1910.134	39	143
SCBA Refresher	019-171-01	29CFR1910.134	0	0
"Haz Com Workshop, Mgrs"	090-754-01	29CFR1910.1200	3	39
Lab Chem Hygiene Wkshop	031-183-01	29CFR1910.1450	0	0
Waste Generator - PA	067-285-01	40CFR Part 264/265	109	529
Waste Generator-NonPA	067-285-02	40CFR Part 264/265	107	287
Waste Generator-NonRad	067-575-01	40CFR Part 264/265	68	621
WSRIC	125-574-01	40CFR Part 264/265	0	0
RCRA Custodian	018-863-01	40CFR Part 264/265	71	454

COURSE NAME	COURSE #	DRIVER	#STUDENTS 2/16 - 3/15	#STUDENTS FYTD
RCRA Tank Custodian	016-863-01	40CFR Part 264/265	26	346
Confined Space Entry	068-741-01	29CFR 1910.146	171	736
TSCA	016-936-01	40CFR	22	178
Asbestos Awareness	056-352-01	AHERA-40CFR	7	61
Line Control Program	019-974-01	DOE 5480.10	31	69
Safety Monitor	TBD	DOE 5480.10	0	0
Environmental Laws & Regs	016-100-01		0	0
		TOTAL	960	4776

**10.3 Environmental Assessment Study, July 1989:** The tasks reported in this section are the result of a 1989 DOE surveillance (commonly referred to as a Tiger Team audit). This Report shows 78 tasks open, up from 20 reported last period. Commitments Tracking reports that the increase in open tasks is due to an effort it is currently undergoing to correct outstanding paperwork that will properly status these tasks. All but 50 of the open tasks will be closed by the next reporting period. Thirty-two of the 50 will be changed to a hold status leaving only 18 open tasks. There are 32 tasks that have been placed on hold after having been reviewed by Issues Management and a determination made as to their level of significance.

Twenty tasks still remain open, with 12 tasks due after the 1993 calendar year. Four tasks were completed during this reporting period, including RCRA storage tasks. One task dealing with RCRA characterization is currently delinquent and three more tasks are due during the next reporting period. Note that all tasks are due to be completed during the next reporting period except 12 that are due well beyond 1993; however, closure must be approved by the DOE. See Table 10 for details.

**10.4 Waste Drums:** Drums containing hazardous waste are tracked in the Waste Environmental Management System (WEMS) where expirations for drums stored beyond the 90-day time-frame can be readily identified. WEMS tracks all drums on plantsite, including empty drums. The WEMS report for this reporting period shows 4 drums that have exceeded the 90-day storage limit. All 4 drums are located within Building 371. Two drums are located in RCRA Unit 350; the remaining drums are located in RCRA Unit 1909. One of the drums in RCRA Unit 1909 is currently being recharacterized as non-hazardous waste.

Of interest also are drums containing materials generated from remediation sampling and investigations. Many of these drums are readily visible in the buffer zone; and most are gray in color indicating environmental contents that may not be hazardous, but are awaiting assessment. Gray drums may be stored in the buffer zone without concern for protection. However, materials generated from known areas

of contamination should be stored in properly colored containers. White drums contain radionuclide contaminated waste, black and white drums contain hazardous waste (containing no radionuclides), and yellow and black drums contain PCBs or asbestos contaminated waste. Currently, the 6 drums in the buffer zone (generated from OU5 and OU6) are now stored in RCRA Unit 18.03, and are now in compliance. The 86 OU2 drums and the 4 Well Abandonment Replacement Program drums that were exceeding the 90-day limit, have been moved to RCRA Unit 18.03 and are also in compliance.

The Riedel diesel fuel spill resulted in 17 drums of waste. These drums were sampled and contained no radionuclide or RCRA constituents. The drums will be shipped offsite during the next reporting period.

**10.5 Ancillary Equipment:** In a January 20, 1993 memorandum (WMED:DG:10688) from DOE, RFO to EG&G, a request to list and justify continued operation of equipment in RCRA non-compliance with secondary containment requirements was made. The initial report was to have been submitted to RFO no later than February 1, 1993, and subsequent monthly updates of that information is to be reported in this report. To that end, the following information has been submitted for inclusion.

The following equipment or systems continue to operate outside of RCRA compliance. Justification for continued operation of each of these systems was provided to RFO in correspondence (93-RF-1332, 93-RF-1335).

- Building 707 Process Waste Drain Line
- Buildings 444/447 Main Process Waste Line
- Building 374 Liquid Waste Processing Area
- Tank 231A, southeast of Building 374, storage of low-level waste feed solutions to Building 374 Building 774 Liquid Waste Processing Area
- Building 771 Process Waste Lines
- Building 776/777 Process Waste Transfer Line
- Central Sump Discharge Line to Solar Pond 207B north
- Solar Pond waste transfer line through Buildings 771, 774, 776 and 778.

Compensatory measures, such as conducting daily visual inspections to detect leaks or performing daily verification of line integrity by hand-starting pumps and verifying normal flow, are in place as an interim action for these systems while they are in noncompliance and until corrective actions are implemented.

The following information has been submitted for inclusion as a status update regarding equipment or systems, reported last month, which continue to operate outside of RCRA compliance.

On March 10, 1993, in correspondence 93-RF-3020, EG&G forwarded a proposal to DOE, RFO for transmittal to the Colorado Department of Health (CDH). The letter offered a proposal to notify CDH of RCRA regulated hazardous waste tank systems which are operating in noncompliance with Colorado Hazardous Waste Regulations (CHWR). The letter also offers to provide justification for continued operation in noncompliance. It is anticipated that a request will be made to CDH requesting concurrence with operating these systems in noncompliance with the CHWR in lieu of removing them from service and jeopardizing health, safety, the environment or other regulatory requirements.



Provide updated information regarding any changes to the current status of noncompliant RCRA units. Information will include progress toward compliance, associated problems, changed conditions, or any other information that will accurately reflect unit conditions each month.

A list of systems which have been shut down because they are not in RCRA compliance will be generated as a task within the Hazardous Waste Compliance and Self-Assessment Response/Action Plan 13 which is currently in draft form. The completion date for this task will be finalized when Action Plan 13 is approved. That information will be provided in this report also, when available.

Updated information on specific equipment or systems is as follows:

- **Buildings 444/447 main process waste line**

Compensatory measures: No hazardous waste from operations within the building will be discharged into the process waste system and inspections will continue to occur on a 24-hour basis for leak detection and inspection purposes.

Corrective action plan number: ENVDEF-38G.

Scheduled completion date for repair of system: June 30, 1993.

Progress made toward compliance: This has been established as a high priority in the building and Engineering tracking systems.

Associated problems: Insufficient Facilities Engineering support for this effort.

Other information: None.

- **Building 707 chiller condensate process waste line**

Compensatory measures: The chiller waste is primarily water and most likely does not meet the definition of a hazardous waste. This system is contained within Building 707 and any leaks would not be directly released to the environment. No hazardous waste is being added to the drain system in Building 707. Additionally, personnel are performing daily inspections of ceiling tiles in order to detect leaks.

Other information: None.

- **Building 374 liquid waste processing area**

Compensatory measures: All piping systems within Building 374 are inspected daily, including at the point where the lines penetrate walls. Additionally, EG&G has proposed alternative interpretation regarding wall penetrations for concurrence from the Colorado Department of Health.

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Corrective action plan number: ENVDEF-033 (Commitment Number 92-007380).

Progress made toward compliance: Awaiting RCRA Regulatory Programs to secure CDH concurrence for continued operations as is.

Other information: None.

- **Building 774 liquid waste processing area**

Compensatory measures: All piping systems within Building 774 are inspected daily, including the point where the lines penetrate walls. Additionally, EG&G has proposed alternative interpretation regarding wall penetrations for concurrence from the Colorado Department of Health.

Corrective action plan number: ENVDEF-61 submitting request for concurrence from CDH for continued operation. PATS closure March 31, 1992, on this plan.

Progress made toward compliance: Awaiting Waste Programs to secure CDH concurrence for continued operation as is.

Other information: None.

- **Building 771 process waste lines**

Compensatory measures: No hazardous waste is being introduced into the process waste system. Additionally, all remaining sinks and sumps not used for laboratory rinse solutions are either administratively or physically removed from service for all liquid waste.

Corrective Action Plan Number: CAB-233-92#2.

Scheduled completion date for repair of system: System is being scheduled for RCRA closure.

Other information: None.

- **Central sump discharge line used to transfer liquid from the interceptor trench located north of the solar evaporation ponds to solar pond 207B north**

Compensatory measures: The central sump is hand started and the discharge point is monitored to verify that normal flow is being delivered to the 207B north pond.

Scheduled completion date for repair of system: The line will be taken out of service by April 15, 1993, thereby restoring environmental compliance.

Progress made toward compliance: Plans to remove the line from service are on schedule.

Other information: None.

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- **Solar pond waste transfer line through Buildings 771, 774, 776, and 778**

Compensatory measures: Wall penetrations and the non-welded valves will be visually inspected once per shift when the transfer line is in use. The line will be used solely for trench water and solar pond water.

Corrective Action Plan Number: Action Plan 13 and CAB-233-92#3 address lack of secondary containment for two valves in Building 771.

Scheduled completion date for repair of system: Secondary containment for the two valves in Building 771 was completed March 22, 1993.

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Progress made toward compliance: The Colorado Department of Health has concurred with DOE's request to operate the Solar Pond waste transfer line.

Other information: None.

- **Building 779 process waste line**

Compensatory measures: Groundwater which infiltrates the area surrounding and inside the containment for Tank T-5 will be sampled and analyzed to determine whether it is a hazardous waste. The groundwater and the building chiller condensate are transported to Tank T-5 for transfer to Building 374 for treatment. No other hazardous waste is being introduced into the T-5 tank system. In the interim, daily inspections of the tank systems continue.

Other information: None.

- **Buildings 776/777 Process Waste Transfer Line**

Compensatory measures: Inspections will continue to occur on a 24-hour basis for leak detection and overfill protection purposes.

Other information: None.

- **Tank 231A, located southeast of Building 374, which is used for storage of low-level waste feed solutions to Building 374. Overfill prevention control on T231A is inoperable.**

Compensatory measures: Shift Order 374-28: includes careful logging of a "running" volume in the tank as each tanker is off-loaded to 231A, a monthly visual verification of actual level in the tank, and locking of fill valve for tank.

Corrective Action Plan Number: ENVDEF-037 (Commitment Number 92-007386).

Scheduled completion date for repair of system: August 2, 1993

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Progress made toward compliance: Procurement complete. Planning and material quote on schedule.

Other information: Planned completion date is ahead of schedule. Installation planned for April 21, 1993. TI024533.

## TABLE 1 - ACTION PLAN LEVEL SUMMARY REPORT

Period: 2/16/93 5/93

SOURCE OF ACTION PLAN	ACTION PLANS PLAN DUE	ACTION PLANS OPEN	NEW ACTION PLANS THIS PERIOD	ACTION PLANS CLOSED THIS PERIOD	ACTION PLANS DELINQUENT	ACTION PLANS DUE DATES TO BE DETERMINED (Not available)
EXTERNAL ASSESSMENTS	8	15	0	46	0	
COLORADO DEPARTMENT OF HEALTH	2	0	0	0	0	
DOE ENVIRONMENTAL OVERSIGHT	10	44	11	2	9	
ENVIRON. ASSESSMENT STUDY JULY 1989	0	8	0	0	1	
EG&G WASTE SURVEILLANCE	14	81	124	55	38	
ENVIRONMENTAL SELF ASSESSMENT	11	6	26	0	1	
ENVIRONMENTAL DEFICIENCY	9	78	0	20	5	
MISCELLANEOUS COMMITMENTS	0	5	1	0	0	
WASTE CONTINGENCY PLANS	0	5	0	1	1	
REGULATORY COMMITMENTS	0	6	0	7	0	
CORRESPONDENCE FROM RFO	4	0	2	0	0	
SURVEILLANCE REPORTS FROM RFO	8	6	10	1	0	
SELF-ASSESSMENT RESPONSE	0	10	0	0	9	
EG&G-SURFACE WATER DIV.	15	0	16	0	0	
STANDARDS, AUDITS & ASSURANCE	1	0	1	0	0	
MIXED RESIDUE TANK SYSTEM	0	25	0	2	0	
TOTALS	82	289	191	127	67	

TABLE 1a - TASK LEVEL SUMMARY REPORT

APRIL 1993

SOURCE OF TASKS	TASKS OPEN	NEW TASKS THIS PERIOD	TASKS CLOSED THIS PERIOD	TASKS DELINQUENT	TASKS DUE DATES TO BE DETERMINED (Not Available)
EXTERNAL ASSESSMENTS	8	8	4	0	
COLORADO DEPARTMENT OF HEALTH	0	0	0	0	
DOE ENVIRONMENTAL OVERSIGHT	60	65	51	17	
ENVIRON. ASSESSMENT STUDY JULY 1989	78	60	1	1	
EG&G WASTE SURVEILLANCE	96	104	126	29	
ENVIRONMENTAL SELF ASSESSMENT	17	4	4	1	
ENVIRONMENTAL DEFICIENCY	168	35	36	16	
MISCELLANEOUS COMMITMENTS	4	1	0	0	
WASTE CONTINGENCY PLANS	6	0	2	2	
REGULATORY COMMITMENTS	246	64	7	5	
CORRESPONDENCE FROM RFO	1	0	0	0	
SURVEILLANCE REPORTS FROM RFO	18	6	3	4	
SELF-ASSESSMENT RESPONSE	28	0	23	12	
TOTALS	730	347	257	87	

## TABLE 2 SELF-ASSESSMENT RESPONSE

Period: 2/16/93-3-31/93

BUILDING NO.	STATUTE	TYPE OF TASKS	# OF TASKS OPEN	NEW TASKS THIS PERIOD	OF TASKS COMP THIS PERIOD	# OF TASKS DELINQUENT	# TASKS DUE NEXT PERIOD
371	RCRA	TRAINING	2	0	1	2	0
444	RCRA	TRAINING	0	0	1	0	0
460	RCRA	TRAINING	0	0	2	0	0
559	RCRA	TRAINING	0	0	1	0	0
664	RCRA	TRAINING	0	0	1	0	0
707	RCRA	TRAINING	0	0	4	0	0
771	RCRA	IDENTIFICATION INVENTORY	1	0	0	1	0
777	RCRA	TRAINING	0	0	1	0	0
779	RCRA	TRAINING	1	1	2	1	0
779	RCRA	PROCEDURE	0	0	0	1	0
779	RCRA	TRAINING	4	0	0	4	0
779	RCRA	NOTICE/REPORTING	0	0	2	0	0
779	RCRA	PROCEDURE	1	0	0	1	0
779	ALL	PLANS	0	0	1	0	0
779	ALL	PROCEDURES	19	0	5	2	7
779	ALL	TRAINING	0	0	2	0	0
		TOTALS	28	0	23	12	7

TABLE 3 CDH NOTICE OF VIOLATION JUNE 1992

NOV #	TASK DESCRIPTION	# OF TASKS OPEN	NEW TASKS THIS PERIOD (NOT APPLICABLE)	# TASKS COMPL. THIS PERIOD	# TASKS DELINQUENT (N/A)
1	CONTINGENCY PLAN NOT TIMELY IMPLEMENTED	1		0	
2	FLOW FROM SCRUBBER SYSTEM STOPPED-RM 1117, 1115, 1105	0		2	
3	TANK D2A DESIGNATED "UN-FIT FOR USE"	0		0	
4	LIQUIDS NOT REMOVED FROM ROOM 1115 AND 1117 TIMELY	1		0	
5	INSPECTORS DISCOVER 106 GAL. IN 2ND CONT. SUMP	0		1	
6	FAILURE TO INSPECT SUMP	0		1	
7	DISCHARGE OF WASTE RELEASED IN BLDG. 371	0		1	
8	CONTINUED USE AND RELEASE OF WASTE AFTER TANKS FULL	0		2	
9	ADEQUATE HAZ. WASTE DETERMINATION	0		0	
10	TRAINING INADEQUATE FOR 129 TANKS	0		1	
11	INADEQUATE INSPECTION RECORDS-129 TANKS	0		1	
12	INADEQUATE INSPECTIONS OF 129 TANKS	0		1	
13	PRIOR SPILL AT 129 TANKS NOT REMEDIATED-CANT INSPECT	1		1	



TABLE 3 CDH NOTICE OF VIOLATION JUNE 1992

NOV #	TASK DESCRIPTION	# OF TASKS OPEN	NEW TASKS THIS PERIOD (NOT APPLICABLE)	# TASKS COMPL. THIS PERIOD	# TASKS DELINQUENT
14	INADEQUATE INFORMATION RE: LAUNDRY WATER	0		0	
15	TREATMENT OF FILTER SOCKS	0		0	
16	IMPROPER DISPOSAL FILTER SOCKS AND LINT	0		0	
17	HAZ. WASTE DETERMINATION/ FILTER SOCKS	0		0	
18	FAILURE TO COMPLETE DAILY INSPECTION LOG-732 TANKS	0		0	
19	FAILURE TO RESPOND TO INSP. LOGS RE: 732 TANKS	0		2	
20	LACK OF KNOWLEDGE CONC. HAZ WASTE REGULATIONS	0		1	
21	KNOWLEDGE OF HAZ. WASTE CONSTITUENTS	0		1	
22	LACK OF KNOWLEDGE RE: INSPECTION OF SPILL CONTROL EQUIPMENT	0		1	
23	INSPECTION FORM DOES NOT INDICATE EQUIP. THAT MUST BE INSPECTED	0		1	
24	SECONDARY CONTAINMENT RESPONSE RE: 887 TANKS	0		1	
25	SUPERVISOR KNOWLEDGE OF INSPECTION LOG-887 TANKS	0		1	
26	REMEDIATE CONTAMINATION	1		0	

TABLE 3 CDH NOTICE OF VIOLATION JUNE 1992

NOV #	TASK DESCRIPTION	# OF TASKS OPEN	NEW TASKS THIS PERIOD (NOT APPLICABLE)	# TASKS COMPL. THIS PERIOD	# TASKS DELINQUENT
27	KNOWLEDGE OF HAZ WASTE CONSTITUENTS-DAILY OPS	0		1	
28	CHARACTER OF WASTE FROM 731 TANKS TO BLDG. 374	0		2	
29	ANALYZE LIQUID SPILL FROM 731 TANKS	0		1	
30	FAILURE TO REMOVE TANK UNFIT FOR SERVICE	0		0	
31	LACK OF KNOWLEDGE RE: INSPECTION FORM CONTENTS	0		1	
32	FALSE REPORTING OF OVERFILL ALARM OPERABILITY	0		2	
33	731 TANK SYSTEM DESIGN INADEQUATE FOR EMPTYING	0		0	
34	HAZ WASTE DETERMIN. WITH INADEQUATE INFORMATION	0		0	
35	SPILLED OIL AND ANTIFREEZE	0		0	
36	WASTE GASOLINE	0		1	
37	REMEDIATION OF KATHENE SOLUTION INADEQUATE	0		1	
38	BLDG. 374 CONTAMINATION NOT REMEDIATED-CANT INSPECT	0		0	
39	IMPROPER STORAGE OF HAZ WASTE 881 AREAS	0		1	

TABLE 3 CDH NOTICE VIOLATION JUNE 1992

NOV #	TASK DESCRIPTION	# OF TASKS OPEN	NEW TASKS THIS PERIOD (NOT APPLICABLE)	# TASKS COMPL. THIS PERIOD	# TASKS DELINQUENT
40	INACCURATE ACCUMULATION START DATE	0		0	
41	INADEQUATE TRAINING RE: HAZ. WASTE STORAGE	0		0	
42	BLDG. 731 CONTAMINATION NOT REMEDIATED	0		0	
43	FAILURE TO MAINTAIN INSPECTION LOGS ON 731 TANKS	0		1	
44	SUPERVISORS NOT AWARE TANKS 731 WERE HAZ. WASTE ACCUMULATION TANKS	0		0	
45	SUPERVISORS NOT KNOWLEDGE ABLE OF HOW 731 TANKS DAILY INSPECTIONS ARE CONDUCTED	0		0	
46	SUPERVISORS NOT KNOWLEDGE ABLE OF HAZ. WASTE CONST. IN 731 TANKS	0		0	
47	HAZ. WASTE BLDG. 771 IMPROPERLY DETERMINED	0		0	
48	HAZ WASTE OIL IMPROPERLY DETERMINED	0		0	
49	SATELLITE CONTAINER DATE IMPROPER	0		1	
50	SCAFFOLDING HAZ. WASTE DETERMINATION IMPROPER	0		0	

TABLE 3 CDH NOTICE OF VIOLATION JUNE 1992

NOV #	TASK DESCRIPTION	# OF TASKS OPEN	NEW TASKS THIS PERIOD (NOT APPLICABLE)	# TASKS COMPL. THIS PERIOD	# TASKS DELINQUENT
51	RELEASE OF CAUSTIC SOLUT. TANKS D2A & D2B NOT CLEANED UP TIMELY	0		0	
52	GLOVEBOX SPILL RESIDUE NOT CLEANED UP TIMELY	0		0	
53	ANCILLARY EQUIP. TANKS D400 A&C LEAK NOT CLEANED	0		1	
54	400 TANK SYSTEM EQUIP. IMPROPER CLEAN UP	1		2	
55	RELEASE OF LIQUIDS D160A NO RESPONSE TO DEFICIENCY	2		1	
56	RELEASE OF LIQUID TANK D180A RESPONSE TO NOTED DEFICIENCY INADEQUATE	0		1	
57	GROUNDWATER ASSESSMENT PLAN COMPLETION & INCLUSION OF STATES REQUIREMENTS	0		1	
58	REVISION OF WORK PLAN FOR OUB	0		1	
	TOTALS	7		39	

BUILDING NO.	STATUTE	TYPE OF TASKS	# OF TASKS		NEW TASKS THIS PERIOD	OF TASKS COMP		# OF TASKS		# TASKS DUE NEXT PERIOD
			OPEN			THIS PERIOD	DELINQUENT			
460	UNCLEAR	MISCELLANEOUS	1		0	0		0	0	
559	RCRA	PLAN	2		1	2		0	0	
	RCRA	INSPECTION	1		0	1		0	1	
	RCRA	RECORD	5		2	0		0	5	
	RCRA	MANAGEMENT	1		1	0		0	0	
	UNCLEAR	PLAN	6		0	0		1	1	
	UNCLEAR	MISCELLANEOUS	1		0	0		0	0	
	UNCLEAR	TRAINING	0		0	1		0	0	
		TOTALS	17		4	4		1	7	

## TABLE 5 REGULATORY COMMITMENTS

Period: 2/16/93-3-15/93

BUILDING NO.	STATUTE	TYPE OF TASKS	# OF TASKS		*NEW TASKS THIS PERIOD	OF TASKS COMP		# OF TASKS		# TASKS DUE	
			OPEN			THIS PERIOD		DELINQUENT		NEXT PERIOD	
FFP	CERCLA	INTERAGENCY AGREEMENT 1/22/91	179		2	1		0		1	
FFP	RCRA	COMPREHENSIVE TREATMENT AND MANAGEMENT PLAN FOR LDRs 6/9/92	4		7	2		1		0	
FFP	CAA	ADMIN. COMPLIANCE ORDER FOR RAD. NESHAPS, 3/13/92	4		14	1		0		1	
FFP	CWA	FFCA-NPDES (FFCA-CSA-90-1) 3/25/91	8		11	1		0		1	
FFP	RCRA	FFCA-LDRs, 5/10/91	3		1	0		0		1	
FFP	RCRA	RESIDUE COMPLIANCE ORDER July 1991	22		29	1		3		3	
FFP	RCRA	MIXED RESIDUE TANK SYSTEMS MANAGEMENT PLAN	26		0	1		1		5	
		TOTALS	246		64	7		5		12	
*Tasks in this column may not have been added during this reporting period, but only entered into PATs during this period.											

Period: 2/16/93-3/15/93

## TABLE 6 COLORADO DEPARTMENT OF HEALTH

BUILDING NO.	STATUTE	TYPE OF TASKS	# OF TASKS OPEN	NEW TASKS THIS PERIOD	OF TASKS COMP THIS PERIOD	# OF TASKS DELINQUENT	# TASKS DUE NEXT PERIOD
THERE ARE NO OUTSTANDING TASKS RESULTING FROM A COLORADO DEPARTMENT OF HEALTH INSPECTION.							
THERE MAY BE TASKS OF INTEREST ASSOCIATED WITH THE PILOT PROJECT. SEE TABLE 4 AND TEXT SECTION 4.							

TABLE 7 DOE ENVIRONMENTAL OVERSIGHT

BUILDING NO.	STATUTE	TYPE OF TASKS	# OF TASKS		NEW TASKS THIS PERIOD	OF TASKS COMP		# OF TASKS		# TASKS DUE	
			OPEN			THIS PERIOD	DELINQUENT	DELINQUENT		NEXT PERIOD	
123	RCRA	CHARACTERIZATION	0		0	1	0	0		0	
	UNCLEAR	MISCELLANEOUS	1		0	0	1	1		0	
331	RCRA	ANALYSIS	0		1	1	0	0		0	
	RCRA	TRAINING	0		2	2	0	0		0	
	RCRA	MANAGEMENT	0		1	1	0	0		0	
	RCRA	RECORD	0		2	2	0	0		0	
	RCRA	ACCESS	0		1	1	0	0		0	
	RCRA										
441	RCRA	CHARACTERIZATION	4		0	0	4	4		0	
	RCRA	RECYCLE	1		0	0	1	1		0	
	RCRA	PROCEDURE	1		0	0	0	0		0	
	RCRA	DISPOSAL	3		0	0	3	3		0	
	RCRA	MISCELLANEOUS	1		0	0	1	1		0	
	RCRA	PLAN	1		0	0	0	0		0	
	SWDA	STORAGE	1		0	0	0	0		1	
	SWDA	INVENTORY	1		0	0	0	0		0	
	SWDA	PLAN	1		0	1	0	0		0	
	SWDA	MANAGEMENT	1		0	0	1	1		0	
528	UNCLEAR	MISCELLANEOUS	1		0	0	1	1		0	
	UNCLEAR										
776	RCRA	LEAK	1		0	0	0	0		0	
	RCRA	CHARACTERIZATION	1		2	2	0	0		0	
	RCRA	RECORD	2		2	2	0	0		0	
	RCRA	PLAN	1		0	0	0	0		0	
	RCRA	TRAINING	3		1	1	0	0		0	
	RCRA	ANALYSIS	1		0	0	0	0		0	
	RCRA	TANKS	1		0	0	0	0		0	
	RCRA	STORAGE	1		0	0	0	0		0	
	UNCLEAR	TRAINING	0		1	1	0	0		0	
	UNCLEAR	MISCELLANEOUS	2		1	1	0	0		0	



TABLE 7 DOE ENVIRONMENTAL OVERSIGHT

Period: 2/16/93 - 2/15/93

BUILDING NO.	STATUTE	TYPE OF TASKS	# OF TASKS OPEN	NEW TASKS THIS PERIOD	OF TASKS COMP THIS PERIOD	# OF TASKS DELINQUENT	# TASKS DUE	
							NEXT PERIOD	
HFP	RCRA	PROCEDURE	7	15	8	0	0	0
	RCRA	CHARACTERIZATION	3	2	0	0	0	0
	RCRA	ANALYSIS	3	7	4	0	0	0
	RCRA	MANAGEMENT	2	2	1	0	0	0
	RCRA	SAMPLING/MONITORING	1	0	0	0	0	0
	RCRA	PLAN	4	4	5	2	0	0
	RCRA	CONTAINER	1	1	1	0	0	0
	RCRA	TRAINING	1	1	0	0	0	0
	RCRA	RECORD	1	1	0	0	0	0
	RCRA	STORAGE	0	1	1	0	0	0
	TSCA	MANAGEMENT	1	0	0	1	0	0
	TSCA	RECORD	1	0	0	1	0	0
T452B	SWDA	INVENTORY	0	0	1	0	0	0
	DOT	PLAN	0	2	2	0	0	0
	RCRA	PLAN	1	1	0	0	1	1
	RCRA	MANAGEMENT	1	2	1	0	0	0
	RCRA	PROCEDURE	1	1	0	0	0	0
	RCRA	INVENTORY	1	5	3	0	1	1
	RCRA	ACCESS	0	1	1	0	0	0
	RCRA	RECORD	0	2	3	0	0	0
	RCRA	STORAGE	0	2	2	0	0	0
	RCRA	MISCELLANEOUS	0	1	1	0	0	0
	UNCLEAR	MISCELLANEOUS	0	0	1	0	0	0
	TOTALS		60	65	51	17	3	3

## TABLE 7a RFO SURVEILLANCE REPORTS

Period: 2/16/93 - 15/93

BUILDING NO.	STATUTE	TYPE OF TASKS	# OF TASKS		NEW TASKS		OF TASKS COMP		# OF TASKS		# TASKS DUE	
			OPEN	THIS PERIOD	THIS PERIOD	THIS PERIOD	THIS PERIOD	DELINQUENT	DELINQUENT	THIS PERIOD	THIS PERIOD	THIS PERIOD
771	FCRA	SCHEDULE	0	1	1	0	0	0	0	0	0	0
	UNCLEAR	MISCELLANEOUS	0	1	1	0	0	0	0	0	0	0
FTP												
	CAA	PLAN	3	0	0	0	0	0	0	0	0	0
	CAA	TRAINING	3	0	0	0	0	0	0	0	0	0
	CAA	MISCELLANEOUS	2	0	0	0	0	1	0	0	0	0
	UNCLEAR	ANALYSIS	2	2	2	0	0	0	0	0	0	0
	UNCLEAR	PLAN	2	2	2	1	0	0	0	0	0	0
	UNCLEAR	MISCELLANEOUS	3	0	0	0	0	0	0	0	0	0
		TOTALS	15	6	3	3	1	0	0	0	0	0

TABLE 9 EG &amp; G WASTE SURVEILLANCE

BUILDING NO.	STATUTE	TYPE OF TASKS	# OF TASKS OPEN	NEW TASKS THIS PERIOD	OF TASKS THIS PERIOD	OF TASKS COMP THIS PERIOD	# OF TASKS DELINQUENT	# TASKS DUE NEXT PERIOD
707 (CONT.)	RCRA	LABEL	1	0	0	0	1	0
750	RCRA	LABEL	1	0	0	0	0	0
771	RCRA	SECONDARY CONTAINMENT	15	0	0	9	0	7
	RCRA	RECORD	0	0	0	33	0	0
	RCRA	INSPECTION	0	0	0	9	0	0
	RCRA	MANAGEMENT	0	0	0	1	0	0
774	RCRA	RECORD	9	8	12	1	1	0
	RCRA	TRAINING	0	0	1	0	0	0
	RCRA	PROCEDURE	1	1	0	0	0	1
	RCRA	SCHEDULE	0	0	1	0	0	0
	RCRA	LABEL	0	2	2	0	0	0
	RCRA	CHARACTERIZATION	1	2	1	0	0	0
	RCRA	INSPECTION	2	2	0	0	0	0
	RCRA	PLAN	2	2	0	0	0	0
	UNCLEAR	MISCELLANEOUS	1	1	0	0	1	0
776	RCRA	CHARACTERIZATION	1	0	1	1	0	1
	RCRA	RECORD	2	2	3	0	0	0
	RCRA	SECONDARY CONTAINMENT	2	0	0	0	0	0
	RCRA	LABEL	1	2	1	0	0	0
	RCRA	INSPECTION	0	1	1	0	0	0
	TSCA	TRAINING	1	1	0	0	0	0
	TSCA	LABEL	0	1	1	1	0	0
	UNCLEAR	MISCELLANEOUS	1	1	0	0	0	0
778	RCRA	CONTAINER	2	2	0	0	0	0
779	RCRA	LABEL	1	4	3	0	0	0
	RCRA	RECORD	5	27	23	1	1	0
	RCRA	CHARACTERIZATION	1	1	0	0	0	1
	RCRA	SECONDARY CONTAINMENT	0	1	1	1	0	0
	RCRA	PROCEDURE	0	3	3	0	0	0

TABLE 9 EG &amp; G WASTE SURVEILLANCE

BUILDING NO.	STATUTE	TYPE OF TASKS	# OF TASKS OPEN	NEW TASKS THIS PERIOD	OF TASKS COMP THIS PERIOD	# OF TASKS DELINQUENT	# TASKS DUE NEXT PERIOD
779 (CONT.)	RCRA	SCHEDULE	0	5	5	0	0
782	RCRA	PROCEDURE	0	0	1	0	0
	RCRA	RECORD	0	0	3	0	0
884	RCRA	LABEL	2	2	0	2	0
	RCRA	STORAGE	1	0	0	1	1
	RCRA	RECORD	1	2	0	1	0
	TSCA	TRAINING	1	1	0	1	0
	UNCLEAR	MISCELLANEOUS	1	1	0	1	0
OU2-	CERCLA	MISCELLANEOUS	0	0	2	0	0
	CERCLA	PLAN	1	1	0	0	0
	CERCLA	PROCEDURE	3	3	0	0	0
	CERCLA	RECORD	1	1	0	0	0
	CERCLA	ACCESS	1	1	0	0	0
OU7	CERCLA	RECORD	1	1	0	0	0
FTP	TSCA	PLAN	1	0	0	0	1
	TSCA	MANAGEMENT	2	0	0	0	0
	TSCA	STORAGE	1	0	0	0	0
	TSCA	TRAINING	1	0	0	0	0
	TSCA	RECORD	2	0	0	0	0
T690A	RCRA	TRAINING	1	0	0	1	0
	TOTALS		96	104	126	29	14

TABLE 9a ENVIRONMENTAL DEFICIENCIES

Period: 2/16/93-5/93

BUILDING NO.	STATUTE	TYPE OF TASKS	# OF TASKS		NEW TASKS		OF TASKS COMPI		# OF TASKS		# TASKS DUE	
			OPEN	THIS PERIOD	THIS PERIOD	THIS PERIOD	THIS PERIOD	DELINQUENT	DELINQUENT	DELINQUENT	NEXT PERIOD	NEXT PERIOD
121		WASTE CHARACTERIZATION	1	0	0	0	0	0	0	0	1	1
		SECONDARY CONTAINMENT	2	0	0	0	0	0	0	0	2	2
		MISCELLANEOUS	2	0	0	0	0	0	0	0	0	0
123		MISCELLANEOUS	0	1	1	1	1	0	0	0	0	0
		SCHEDULE	1	0	0	0	0	0	0	0	0	0
		SCHEDULE	0	0	0	1	1	0	0	0	0	0
250		MISCELLANEOUS	1	0	0	0	0	0	0	0	1	1
		IDENTIFICATION	1	0	0	0	0	0	0	0	0	0
334		LABORATORY ANALYSIS	1	0	0	0	0	0	0	0	1	1
		MISCELLANEOUS	1	0	0	0	0	0	0	0	1	1
		PLAN/DISPOSAL	2	1	1	0	0	0	0	0	0	0
371		DOCUMENTATION	0	1	1	0	0	0	0	0	0	0
		DRUMS	6	0	0	1	1	0	0	0	0	0
		MISCELLANEOUS	2	0	0	2	2	0	0	0	1	1
		LABELS	0	1	1	0	0	0	0	0	0	0
		REPAIR	2	0	0	0	0	0	0	0	0	0
		PACKAGING	0	0	0	0	0	0	0	0	0	0
		SCHEDULE	2	0	0	0	0	1	1	0	0	0
		INSPECTION	2	0	0	0	0	1	1	0	0	0
		REPAIR	1	0	0	0	0	0	0	0	0	0
		MISCELLANEOUS	0	0	0	2	2	0	0	0	1	1
374		SCHEDULE	1	0	0	1	1	0	0	0	0	0
		INSPECTION	1	0	0	1	1	0	0	0	0	0
		MISCELLANEOUS	12	2	2	2	2	2	2	3	3	3
444		ANALYSIS	2	0	0	1	1	0	0	0	1	1
		WASTE CHARACTERIZATION	0	0	0	0	0	0	0	0	2	2
		ANALYSIS	3	0	0	0	0	0	0	0	0	0
549		PLAN/DISPOSAL	1	0	0	0	0	0	0	0	0	0
		PLAN/DISPOSAL	1	0	0	0	0	0	0	0	0	0

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TABLE 9a ENVIRONMENTAL DEFICIENCIES

Period: 2/16/93-3/15/93

BUILDING NO.	STATUTE	TYPE OF TASKS	# OF TASKS OPEN		NEW TASKS THIS PERIOD		OF TASKS COMP THIS PERIOD		# OF TASKS DELINQUENT		# TASKS DUE NEXT PERIOD	
551		REPAIR	2		0		2		0		0	
		INSPECTION	1		0		0		0		0	
		MISCELLANEOUS	0		0		0		0		1	
561		DRUMS	0		0		1		0		0	
		PACKAGING	2		0		0		0		0	
664		LABELS	0		0		1		0		0	
666		DISPOSAL	1		0		0		0		0	
		CHARACTERIZATION	1		0		0		0		0	
703		MISCELLANEOUS	7		0		1		4		0	
707		SECONDARY CONTAINMENT	1		0		1		0		1	
		MISCELLANEOUS	2		2		2		1		0	
731		SECONDARY CONTAINMENT	1		0		2		0		1	
		MISCELLANEOUS	0		0		1		1		0	
750		DRUMS	1		0		0		0		0	
		PACKAGING	4		0		0		0		0	
771		TRAINING	0		0		0		1		0	
		SAMPLING	2		0		0		2		0	
		MISCELLANEOUS	4		3		1		0		0	
774		SECONDARY CONTAINMENT	0		0		1		0		0	
		MISCELLANEOUS	2		3		0		0		0	
776		MISCELLANEOUS	14		6		2		0		1	
		TANK	1		0		0		0		0	
		aisle space	1		0		0		0		0	
		LABELS	1		0		0		0		1	
777		DECONTAMINATION	0		1		0		0		0	
		TANKS/REPAIR	3		0		0		0		0	

TABLE 9a ENVIRONMENTAL DEFICIENCIES

Period: 2/16/93 - 3/93

BUILDING NO.	STATUTE	TYPE OF TASKS	# OF TASKS OPEN	NEW TASKS THIS PERIOD	OF TASKS COMP THIS PERIOD	# OF TASKS DELINQUENT	# TASKS DUE NEXT PERIOD
		MISCELLANEOUS	3	1	0	0	0
779		MISCELLANEOUS	2	0	0	0	0
788		SECONDARY CONTAINMENT	1	0	0	0	0
		MISCELLANEOUS	2	0	0	0	0
883		REPAIR	1	0	0	0	1
		MISCELLANEOUS	0	0	1	0	0
884		PACKAGING	5	0	0	0	0
885		SECONDARY CONTAINMENT	0	0	0	1	0
904		PACKAGING	5	0	0	0	0
		WASTE CHARACTERIZATION LABELS	5	0	0	0	0
		MISCELLANEOUS	1	0	0	0	0
			0	0	1	0	0
964		WASTE CHARACTERIZATION	5	1	3	0	0
		MISCELLANEOUS	3	4	1	1	0
		DISPOSAL	1	0	0	0	0
C. SUMP		MISCELLANEOUS	1	0	0	0	0
CWD TF		MISCELLANEOUS	1	0	0	0	0
DEL		WASTE CHARACTERIZATION	1	0	0	0	0
		MISCELLANEOUS	1	0	1	1	0
		DISPOSAL	1	0	0	0	0
		PLAN	1	0	1	0	0
LANDFILL		PLAN	1	0	0	0	0
		MISCELLANEOUS	12	3	0	0	0
		WASTE CHARACTERIZATION	0	4	0	0	0
SOLAR PONDS		MISCELLANEOUS	3	1	3	0	1

## TABLE 9a ENVIRONMENTAL DEFICIENCIES

Period: 2/16/93 - 5/93

BUILDING NO.	STATUTE	TYPE OF TASKS	# OF TASKS OPEN	NEW TASKS THIS PERIOD	OF TASKS COMP THIS PERIOD	# OF TASKS DELINQUENT	# TASKS DUE NEXT PERIOD
RFP		INSPECTION	1	0	0	0	0
		NOTIFICATION	4	0	0	0	0
		MISCELLANEOUS	4	3	0	0	1
		TRAINING	1	0	0	0	1
		SPILL	2	0	0	0	1
		TOTALS	168	35	36	16	27



## TABLE 10 MISCELLANEOUS COMMITMENTS

Period: 2/16/93-3/ 93

BUILDING NO.	STATUTE	TYPE OF TASKS	# OF TASKS OPEN	NEW TASKS THIS PERIOD	OF TASKS COMP THIS PERIOD	# OF TASKS DELINQUENT	# TASKS DUE NEXT PERIOD
CORRESPONDENCE FROM RFO							
FTP	UNCLEAR	PLAN	1	0	0	0	0
FTP	UNCLEAR	ASSESSMENT/ANALYSIS	1	0	0	0	0
ENVIRONMENTAL ASSESSMENT STUDY, JULY 1989 (TIGER TEAM)							
OU1	CERCLA	SAMPLING/MONITORING	1	0	1	0	0
OU1	CERCLA	REPORT/PLAN	2	2	0	0	0
OU1	CERCLA	DESIGN/CONSTRUCTION	3	3	0	0	0
OU2	CERCLA	SAMPLING/MONITORING	4	4	0	0	0
OU2	CERCLA	REPORT/PLAN	2	2	0	0	0
OU5	CERCLA	SAMPLING/MONITORING	1	0	0	0	0
OU5	CERCLA	REPORT/PLAN	1	0	0	0	0
FTP	CAA	MISCELLANEOUS	1	0	0	0	1
FTP	CAA	SAMPLING/MONITORING	4	3	0	0	0
FTP	CAA	COMRAD SAMPLING	25	25	0	0	0
FTP	CWA	NPDES PERMIT	2	2	0	0	0
FTP	CWA	FEASIBILITY STUDY	2	2	0	0	0
FTP	CWA	DESIGN	3	1	0	0	1
FTP	RCRA	SECONDARY CONTAIN.	5	2	0	0	0
FTP	RCRA	DECOMMISSIONING	1	0	0	0	0
FTP	RCRA	CHARACTERIZATION	1	0	0	1	0
FTP	RCRA	PROCEDURE	1	0	0	0	0
FTP	RCRA	DESIGN	6	0	0	0	0
FTP	SWDA	LANDFILL (NEW)	4	4	0	0	0
FTP	UNCLEAR	MISCELLANEOUS	4	4	0	0	0
FTP	UNCLEAR	PROGRAM	1	1	0	0	0
TOTALS			78	60	1	1	2
MISCELLANEOUS COMMITMENTS							
776	RCRA	LEAK PREVENTION	4	0	0	0	1
776	UNCLEAR	FWCP WORK SCOPE	0	1	0	0	0

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TABLE 10 MISCELLANEOUS COMMITMENTS

Period: 2/16/93-3/1/93

BUILDING NO.	STATUTE	TYPE OF TASKS	# OF TASKS OPEN	NEW TASKS THIS PERIOD	OF TASKS COMP THIS PERIOD	# OF TASKS DELINQUENT	# TASKS DUE NEXT PERIOD
<b>EXTERNAL ASSESSMENTS</b>							
774	RCRA	TANKS	8	8	4	0	8
<b>SURFACE WATER DIVISION</b>							
444	RCRA	SECONDARY CONTAINMENT	1	1	0	0	0